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Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

June 8, 2000
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
• # 1 - June 2000 Monthly Report

Dear Mr. Turner and Mr. Martin,

Enclosed is the June 2000 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of Section V, "UAO", 3.4. Reporting, of the UAO. This is the initial monthly report for the UAO, which requires that they begin 30 calendar days after approval of the Time Critical Removal Action Work Plan. The TCRAWP was approved May 10, 2001.

Sincerely,

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

Mike McAteer - USEPA Region 5
S. Bron - IEPA
Mayor D. Reed - Cahokia
Mayor P. Sauget - Sauget, IL
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Sauget File - Solutia
Mike Henry - IDNR
Kevin de la Bruere - USF&G
John Fiore - Sauget Sites

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: June 8, 2000
Period Covered: May 1, 2000 - May 31, 2000
Next Report Period: June 1, 2000 - June 30, 2000

Background

A Unilateral Administrative Order ("UAO") was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December. Bids were received in late January and were evaluated in February.

Fieldwork began on the sediment de-watering phase of the project in November 2000 and continued throughout the Report Period. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments over the next several months - while the containment cell is being constructed - was completed and started up in February. Operations of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001. A revised draft containment cell design was submitted to the Agencies March 30, 2001. This revised draft containment cell design incorporated all Agencies' comments and changes agreed to during the preceding discussion period. Placement of fill for the Containment Cell berms began April 23, 2001. The March 30, 2001 revised draft containment cell design (as further revised) was approved by the Agencies in a May 10, 2001 letter. Solutia will continue to address any remaining issues in good faith.

Agency Actions / Communications

- Approval of the Time Critical Removal Action Work Plan and the Containment Cell design was received in a May 10, 2001 letter from USEPA.
- May 29, 2001 – Solutia received comments from Rob Watson of IEPA via Kevin Turner of USEPA on the Sauget Area I TSCA Containment Cell.

Work Performed during the reporting period

- Work on construction of the containment cell continued with the placement of borrow soils for the cell berms.
- Sediment dewatering continued in Creek Sectors B, C, D, E and Site M.
- Completed clearing and debris removal in creek.
- Excavated low flow channel in creek to improve sediment drying.
- Installed safety fence and access gates to secure creek segments.

Data Submittal

- There is no new data to submit

Work scheduled for next reporting period

- Placement of borrow soils for the containment cell berms will continue.
- Site M will be drained and the sediments placed within a constructed holding area located in Sector B and allowed to dry. Confirmatory sampling of Site M soils will be conducted.
- Begin constructing capillary zone for containment cell.
- Mobilization of liner system components.
- Complete archeological investigation in Segment B.
- Begin construction of stormwater storage and treatment system to support cell operations.

- Begin sediment removal in culvert pipes under Rt. 157 and 3.

Problems and Solutions

- None

Submittal Schedule Status

- See attached UAO schedule

Issues under review

- The Groundwater Monitoring Plan is under review by the Agencies.
- Agency Comments on the Containment Cell are being addressed by Solutia.

Comments

- None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

| Deliverable | Description | Due Date |
|---|--|----------------------|
| Issuance Date | Date UAO signed by Muno | 31-May-00 |
| Effective Date | 10 business day after issuance | 14-Jun-00 |
| Notice of Intent to Comply | 3 business days after effective date | 19-Jun-00 |
| Designation of Contractor and Project Coordinator | 5 business days after effective date | 21-Jun-00 |
| Access | 14 calendar days after effective date | 28-Jun-00 |
| Time Critical Removal Action Work Plan Submittal | 15 business days after effective date | 7-Jul-00 |
| EPA Approval of TCRA W/P | | May 10, 2001 |
| Monthly Reports | Begin 30 calendar days after approval of TCRA W/P until completion | June 10, 2001 |
| Final Report | 60 Calendar days after completion of sediments and soils removal | |
| Mitigation Plan | 60 Calendar days after completion of sediments and soils removal | |
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